

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 20-203 (PAM/KMM)

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United States of America,

Plaintiff,

vs.

**MOTION FOR COMPLIANCE  
WITH FEDERAL RULE OF  
CRIMINAL PROCEDURE 16**

Francisco Manuel Rodriguez Valenzuela,

Defendant.

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Defendant Francisco Manuel Rodriguez Valenzuela, by and through his attorney, Steven J. Wright, respectfully moves the Court for the following relief:

- 1) An order requiring the government to disclose and provide an opportunity to Defendant for inspection, copying, and photographing any relevant written or recorded statements made by Defendant, those portions of any written record containing the substance of any relevant oral statement made by Defendant, any recorded testimony of Defendant before a grand jury that relates to the offenses charged, and the substance of any other relevant oral statement made by Defendant if the government intends to use that statement at trial. Fed.R.Crim.P. 16(a)(1)(A);
- 2) An order requiring the government to provide Defendant with copies of any handwritten or tape-recorded notes of interviews, debriefings, or

surveillances of Defendant and the alleged co-conspirators made during this investigation. Fed.R.Crim.P. 16(a)(1)(A);

3) An order requiring the government to provide Defendant with any statements within the meaning of Rule 16(a)(1)(A) of the Federal Rules of Criminal Procedure made by his codefendants and alleged co-conspirators, whether named or unnamed;

4) An order requiring the government to provide Defendant with his criminal record, if any. Fed.R.Crim.P. 16(a)(1)(B);

5) An order requiring the government to permit Defendant to inspect, copy, and photograph all tangible objects, including books, papers, documents, photographs, buildings, places, tapes, computer disks, or the contents of any magnetic, optical, or other storage device that are material to the preparation of Defendant's defense or are intended for use by the government as evidence in chief at the trial, or were obtained from or belong to Defendant. Fed.R.Crim.P. 16(a)(1)(C).

6) An order requiring the government to provide Defendant with the results of any physical or mental examinations, scientific tests or experiments, and permission for Defendant to inspect, copy, and photograph the results or reports of physical or mental examinations, scientific tests or experiments that are material to the preparation of the defense or that are intended for use by the

government as evidence in chief at trial, including but not limited to permission to inspect or obtain copies of any test results as well as the results of any fingerprint examinations that may have been performed. Fed.R.Crim.P. 16(a)(1)(D); and,

7) An order requiring the government to disclose to Defendant a written summary of testimony the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case-in-chief at trial describing the witnesses' opinions, the basis and reasons for those opinions, and the witnesses' qualifications. Fed.R.Crim.P. 16(a)(1)(E).

Dated: October 13, 2020

Respectfully submitted,

/s/ Steven J. Wright  
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ATTORNEY FOR DEFENDANT